

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOHN EDWARD SUAREZ,

INDICTMENT

Defendant.

The Grand Jury charges:

COUNT 1

(Attempted Enticement of a Minor)

Between on or about January 1, 2022 and on or about March 14, 2022, in Muskegon County, in the Southern Division of the Western District of Michigan, and elsewhere, the defendant,

JOHN EDWARD SUAREZ,

used facilities and means of interstate and foreign commerce to knowingly attempt to persuade, induce, and entice an individual who was under the age of 18 years to engage in sexual activity for which any person could be charged with a criminal offense.

Specifically, defendant used the cellular communications network to attempt to persuade, induce, and entice Victim 1, a female who he knew to be under 16 years of age, to produce an image of the lascivious exhibition of her vagina and send that image to him, for which he could be charged with sexual exploitation of a minor, in violation of 18 U.S.C. §2251(a).

18 U.S.C. § 2422(b)

18 U.S.C. § 2256(8)

18 U.S.C. § 2247

18 U.S.C. § 2426(b)(1)(B)

COUNT 2

(Penalties for Registered Sex Offenders)

Between on or about January 1, 2022 and on or about March 14, 2022, in Muskegon County, in the Southern Division of the Western District of Michigan, and elsewhere, the defendant,

JOHN EDWARD SUAREZ,

an individual required by Michigan law to register as a sex offender, committed one or more felony offenses involving a minor under Title 18, United States Code, Section 2422, as alleged in Count 1 of this Indictment.

18 U.S.C. § 2260A

FORFEITURE ALLEGATION
(Attempted Enticement of a Minor)

The allegation contained in Count 1 of this Indictment is hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 2428.

Pursuant to 18 U.S.C. § 2428, upon conviction of the offense in violation of 18 U.S.C. § 2422, the defendant,

JOHN EDWARD SUAREZ,

shall forfeit to the United States of America any visual depiction described in 18 U.S.C. § 2256(8); any matter which contains any such visual depiction that was produced, transported, mailed, shipped, or received in violation of Title 18, United States Code, Chapter 117 any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense(s); and any property, real or personal, used or intended to be used to commit or to promote the commission of the offense(s) or any property traceable to such property. The property to be forfeited includes, but is not limited to, the following: “Blu” cell phone, Model Blu-B130DL, IMEI # 355140115998911.

18 U.S.C. § 2428
21 U.S.C. § 853(p)
28 U.S.C. § 2461(c)
18 U.S.C. § 2422
18 U.S.C. § 2256(8)

PRIOR FELONY CONVICTIONS

The Grand Jury finds that at the time of the illegal act alleged in Count 1, the defendant, JOHN EDWARD SUAREZ, had prior sex offense convictions under the laws of any state.

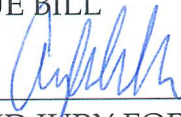
1. Specifically, on March 20, 1993, JOHN EDWARD SUAREZ, in Allegan County, Michigan, in the 48th Circuit Court (case number 93009236-FH-B) was convicted of Criminal Sexual Conduct in the Second Degree (Person Under 13) in violation of Mich. Comp. Laws § 750.520c(1)(a).

2. Specifically, on October 31, 2016, JOHN EDWARD SUAREZ, in Muskegon County, Michigan, in the 14th Circuit Court (case number 16004469-FH-A) was convicted of First Degree Criminal Sexual Conduct (Person Under 13, Defendant 17 or Older) in violation of Mich. Comp. Laws § 750.520b(2)(b).

18 U.S.C. § 2426(b)

18 U.S.C. § 2247

A TRUE BILL



GRAND JURY FOREPERSON

MARK A. TOTTEN
United States Attorney



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